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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

DANIEL LUCERO,

Plaintiff,

v.

ISABEL GUZMAN, ADMINISTRATOR  
and SMALL BUSINESS  
ADMINISTRATION,

Defendants.

Case No. 2:21-cv-00915-RFB-MDC

**Stipulation and Order to  
Extend Certain Discovery Deadlines  
(Sixth Request)**

Pursuant to LR IA 6-1 and LR 26-3, the parties request an extension of the January 30, 2024, deadline to file dispositive motions to February 29, 2024, and all related briefing and JPTO deadlines thereafter, as follows. This is the sixth request for an extension.

**DISCOVERY COMPLETED**

The parties have completed the following disclosures and discovery:

The parties served their respective initial disclosures, and Plaintiff supplemented their disclosures.

Defendant served initial discovery requests, and Plaintiff responded to them.

On June 16, 2023, Defendant took Plaintiff's deposition.

On June 22, 2023, Plaintiff took the deposition of former SBA employee Denise Biaggi-Ayer.

**DISCOVERY REMAINING**

Discovery was completed on July 19, 2023.

**WHY REMAINING DISCOVERY HAS NOT BEEN COMPLETED**

This request concerns only the dispositive motions and related briefing deadlines, and the Joint Pretrial Order deadline. The undersigned AUSA requests this extension because of a heavy workload – preparation for a settlement conference on February 5, 2024, in *Quintero v. US*, Case No. 2:22-cv-01943-GMN-NJK, briefs in other cases including a motion for summary judgment and motion to compel. Plaintiff's counsel does not object and suggested thirty (30) days for the extension due to his client being out of the country until mid-February. For these reasons, the parties agreed to the revised schedule below.

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**EXTENSION OF THE DISCOVERY PLAN AND SCHEDULING ORDER**

The extension of the remaining deadlines in the case would result in the following revised discovery schedule:

SCHEDULED EVENT	CURRENT DEADLINE	PROPOSED DEADLINE
Dispositive Motions	01/30/2024	02/29/2024
Oppositions to Dispositive Motions	02/29/2024	04/01/2024
Replies re Dispositive Motions	03/21/2024	04/22/2024
Proposed Joint Pretrial Order	02/29/2024	04/01/2024 <sup>1</sup>

This request for an extension of time is not sought for any improper purpose including delay.

Respectfully submitted this 18th day of January 2024.

BLACK & WADHAMS

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/s/ Rusty Graf  
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*Attorney for Plaintiff*

/s/ Virginia T. Tomova  
VIRGINIA T. TOMOVA  
Assistant United States Attorney

**IT IS SO ORDERED:**

**Dated:** January 19, 2024

  
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**RICHARD F. BOULWARE, II**  
**UNITED STATES DISTRICT JUDGE**

<sup>1</sup> If dispositive motions were filed, the deadline for the Proposed Joint Pretrial Order would be deferred until 30 days after the Court rules on the dispositive motions.